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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

v.

CARL M. FORCE IV and
SHAUN W. BRIDGES,

Defendants.

UNSEALING APPLICATION AND
[PROPOSED] UNSEALING ORDER

3-15-70370

The United States hereby applies for an order directing that the previously sealed paragraph of the affidavit in the above-titled matter, together with the application and this SEALING APPLICATION AND SEALING ORDER

1 court's sealing order sealing that paragraph, be hereby unsealed. The prosecutors in the
2 Southern District of New York moved to unseal, and Judge Katherine B. Forrest has now
3 unsealed, the previously sealed materials in *United States v. Ulbricht* relating to the
4 investigation in the above-captioned case. Accordingly, I hereby request the sealed paragraph
5 that was part of Special Agent Gambaryan's affidavit be unsealed.
6

7 WHEREFORE, I respectfully request that the Court issue an order granting this
8 application.
9

10 DATED: March 30, 2015

Respectfully submitted,

11 MELINDA HAAG
12 United States Attorney

13 
14 KATHRYN HAUN
Assistant United States Attorney

15 **ORDER**

16
17 For good cause shown, IT IS HEREBY ORDERED THAT:

18 The previously sealed paragraph of the affidavit in the above-titled matter, together with
19 the application, and this Court's sealing order, are hereby ordered UNSEALED and may now be
20 publicly filed. The Clerk of Court is hereby directed to public file those documents.
21

22 IT IS SO ORDERED.

23
24 DATED: March 31, 2015

25 
26 HONORABLE MARIA ELENA JAMES
27 UNITED STATES MAGISTRATE JUDGE
28

1 **PARAGRAPH PROVIDED TO COURT UNDER SEAL**

2 I am aware that the federal prosecutors who are prosecuting this case made substantive
3 disclosures to the prosecutors in both the Southern District of New York and the District of Maryland
4 very early on in the government's investigation against FORCE. Those disclosures continued
5 throughout this investigation.

6 In advance of trial in United States v. Ulbricht, the Southern District of New York prosecutors
7 took the information concerning the FORCE investigation and disclosed it in a detailed letter filing to
8 the federal judge presiding over that trial, Judge Katherine B. Forrest. Those prosecutors requested
9 permission to provide that disclosure to Ulbricht and his defense team under seal and pursuant to a
10 Protective Order. Judge Forrest ordered that disclosure made to Ulbricht and his defense team, and the
11 disclosure was made in December 2014. Because of the sensitive nature of the investigation, the fact
12 that investigation was still ongoing (and subject to the strictures of Fed. R. Crim. P. 6(e)), and the fact
13 that FORCE had not worked on the New York Silk Road investigation, Judge Forrest ordered that the
14 fact of the FORCE investigation information remain under seal until further order of the Court.

15 My understanding from the prosecutors in this Northern District of California case against
16 FORCE and BRIDGES is that, as soon as FORCE and BRIDGES are apprehended and/or surrender and
17 the Complaint is therefore unsealed, the prosecutors in the Southern District of New York will make an
18 application to Judge Forrest to unseal the previously-sealed disclosures that were made to Ulbricht and
19 his defense team.

20 However, because those matters are sealed and the instant Complaint will become automatically
21 unsealed upon the apprehension and/or surrender of FORCE and BRIDGES, I seek a separate Protective
22 Order with respect to this Paragraph that is intended for Page 11 of the Affidavit. I request that this
23 Paragraph remain sealed until further order of this Court. The government will submit an unsealing
24 request for this Paragraph immediately upon learning that Judge Forrest has unsealed the underlying
25 documents and materials in the Ulbricht matter. A Proposed Order is attached.

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3-15-70370

UNITED STATES OF AMERICA,

v.

CARL M. FORCE IV and
SHAUN W. BRIDGES,

Defendants.

SEALING APPLICATION AND [PROPOSED]
SEALING ORDER
FILED UNDER SEAL

The United States hereby applies for an order directing that the sealed paragraph of the affidavit in the above-titled matter, together with the application and this court's sealing order, SEALING APPLICATION AND SEALING ORDER

FILED

MAR 25 2015

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SEALED
BY COURT ORDER

MEJ

1 be kept under seal until further order of the Court. The United States requests that the above-
2 described materials be sealed to preserve the confidentiality of the matters under seal in *United*
3 *States v. Ulbricht*.

4
5
6 WHEREFORE, I respectfully request that the Court issue an order granting this
7 application.

8 DATED: March 25, 2015

Respectfully submitted,

9 MELINDA HAAG
United States Attorney

10
11 
12 WILLIAM FRENTZEN
Assistant United States Attorney

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14
15 **ORDER**

16 For good cause shown, IT IS HEREBY ORDERED THAT:

17 The sealed paragraph of the affidavit in the above-titled matter, together with the
18 application, and this Court's sealing order, be kept under seal until further order of the Court.
19

20 IT IS SO ORDERED.

21
22 DATED: March 25, 2015

23 
24 HONORABLE MARIA ELENA JAMES
UNITED STATES MAGISTRATE JUDGE